

## SANCTIONS STUDY PRIORITY RECOMMENDATIONS AND DWS FOLLOW-UP C&I MEETING PRESENTATION

Priority Recommendations	Actions Taken	Future Planned Actions
<b>Training</b>		
1. Provide training to case managers and supervisory staff to increase awareness of diversity issues. Identify, analyze and share the results of research from other states that examine the impact of case managers' decision making on sanctioning, with the goal of reducing differential impacts.	<ol style="list-style-type: none"> <li>1. In August, 2005, W-2 new worker training was updated to place a stronger emphasis on diversity issues. (August 2005)</li> <li>2. In April, 2005, DWS initiated delivery a one-day training program known as "Bridges Out of Poverty: Strategies for Professionals and Communities." The course provides information and skills for W-2 staff to help bridge the gap between the worlds of poverty and the middle class. (Ongoing)</li> </ol>	<ol style="list-style-type: none"> <li>1. One-day classroom training, "Diversity: Recognize, Respect, Connect," will be delivered throughout the state mid-2006. The course focuses on expanding the definition of diversity and measuring trainee's thoughts, words, and actions against such concepts as bias, stereotype, perception and respect. (July 2006)</li> </ol>
2. Develop policy and staff training to emphasize the need for accommodations for participants with health conditions (or children with disabilities) that preclude full-time participation. Those accommodations can include but are not limited to reducing required participation hours.	<ol style="list-style-type: none"> <li>1. In October, 2005 "Introduction to the Americans with Disabilities Act (ADA)" a computer-based training (CBT) program was published and made available to all W-2 workers. This course will be a required training for all W-2 workers. (Ongoing)</li> </ol>	<ol style="list-style-type: none"> <li>1. DWS will monitor completion of the "Introduction to the Americans with Disabilities Act (ADA)" listed under Actions Taken to ensure that W-2 agencies are meeting this training requirement. (Ongoing)</li> </ol>
3. Evaluate W-2 training curriculum to determine how discretionary aspects of W-2 policy are trained. Determine if training outcomes are consistent with stated law, administrative rule and policy. Focus training to ensure that FEPs and supervisory staff understand policy and appropriately use guidelines when exercising discretion.	<ol style="list-style-type: none"> <li>1. Discretionary aspects of W-2 policy were covered as a part of "W-2 Refresher for FEPs" delivered in 2005. (Ongoing)</li> </ol>	<ol style="list-style-type: none"> <li>1. Ten sessions of "W-2 Refresher for FEPs" are planned for statewide delivery in 2006. (2006)</li> </ol>
<b>Policy/Statute</b>		
4. Provide more guidance through policy in the area of granting "good cause." Guidelines should include reasons similar to those specified in Learnfare. The "good cause" process should be made accessible to people with a variety of barriers, and specify documentation for "good cause" and timeframe. Agency practice must comply with state policy guidelines.	<ol style="list-style-type: none"> <li>1. In response to this recommendation, DWS issued Operations Memo 05-52 on December 21, 2005 to update and clarify the good cause policy for W-2.</li> </ol>	<ol style="list-style-type: none"> <li>1. The new good cause policy guidelines will be included in the next release of the W-2 Manual.</li> </ol>
5. Emphasize through policy that assessment, including formal assessment, is an ongoing process and not a one-time event. Establish a trigger that requires that additional assessments and intensive case management would be offered to participants who receive severe or repeated sanctions, or to establish if they are employed full-time.	<ol style="list-style-type: none"> <li>1. DWS published the "Evaluation of W-2 Screening and Assessment Process" beginning in March 2006.</li> <li>2. In August, 2005, DWS published an online training exercise in support of Operations Memo 05-14, "CARES Work Program Barrier Screen Enhancements." This training is now offered online on an ongoing basis. (August 2005)</li> <li>3. In August 2005, updates were made to W-2 new worker training to reflect the barrier screen</li> </ol>	<ol style="list-style-type: none"> <li>1. DWS BW-2 Policy Section will develop policy guidance for pre-payment reduction processes for significant sanction. Results of the "Evaluation of W-2 Screening and Assessment Process" will inform this policy development. (June 2006)</li> <li>2. With the March 2006 release of the W-2 screening and assessment evaluation report,</li> </ol>

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	<p>enhancements. (August 2005)</p> <p>4. In March 2005, a two-day classroom training on "W-2 Refresher for FEPs" was released. The course reviews the assessment process and appropriate W-2 placement of participants. This training is now offered on an ongoing basis. (March 2005)</p> <p>5. In April 2005, DWS published an online training exercise in support of Operations Memo 04-62, "Enhancements to the Barrier Detail Screen." This training is now offered online on an ongoing basis. (April 2005)</p> <p>6. Between July 2004 and June 2005, eight sessions of a one-day classroom training on "Case Management Intervention Strategies for W-2 Staff" were provided to local W-2 agency staff. The course stresses sound assessment and access to resources as being critical to effective case management. This training is now offered on an ongoing basis. (June 2005)</p>	<p>DWS is planning to reconvene an advisory group. The purposes of the group include:</p> <ul style="list-style-type: none"> <li>• Reviewing results of the W-2 screening and assessment evaluation along with current national research on the topic of screening and assessment for the TANF population.</li> <li>• Surveying W-2 agencies to learn about their experiences with the Barrier Screening Tool (BST) and recommendations for improvement</li> <li>• Using the research and survey information to enhance the W-2 screening and assessment process. Areas of focus will include: <ul style="list-style-type: none"> <li>• -W-2 screening and assessment policy and procedures</li> <li>• -Determination if changes are needed to the BST</li> <li>• -Gather and disseminate screening and assessment best practices</li> </ul> </li> </ul>
<p>6. Restore the fair hearing process. (This would require a statutory change.)</p>	<p>1. DWS agrees with this recommendation. The recommendation would require statutory language changes. Previous attempts by DWD to implement these changes have been unsuccessful.</p>	

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7. Establish a definition of what activities can be sanctioned. Only work activities should be sanctionable. Activities related to health needs would not be sanctionable. Train staff to assist customers on compliance.	1. DWS believes that current non-participation policy is appropriate for an employment and training policy and does not support changing that policy.	
<b>Practice/Implementation</b>		
8. Identify best practices that reduce inappropriate sanctioning to be implemented with agencies statewide. Determine if there are case management strategies or practices that lead to inappropriate sanctions.	1. DWS agrees with this recommendation. DWS will be promoting the use of best practices to reduce inappropriate sanctioning and to determine if there are case management strategies or practices that lead to inappropriate sanctions.	<ol style="list-style-type: none"> <li>1. DWS will discuss the outcomes of both sanction studies and follow-up at 4/21/06 C&amp;I meeting.</li> <li>2. DWS will convene a series of events in Fall 2006 that will allow Financial and Employment Planners to discuss a variety of case management strategies, including this topic. Best practice ideas from all of the sessions will be compiled and be made available to all W-2 staff via the web. (Fall 2006)</li> <li>3. Through the Screening and Assessment Process Evaluation advisory group, DWS will review how assessment may address circumstances where participant has pattern of substantial and chronic sanctions.</li> </ol>
9. Develop an action plan of ways to improve case management, including targeted training, policy clarification and system and reporting tools that can help FEPS.	Good case management is a priority of DWS. The division's activities in response to the Sanctions Study recommendations in the area of training, policy clarification, monitoring and analysis support that commitment and this recommendation.	1. DWS is developing a process to measure quality case management. Results of this process will be shared at events such as the one described in #8 above. (Fall 2006)
10. Hold periodic roundtables for FEPs and supervisory staff to review case scenarios and discuss as a group where the individual should be placed in W-2, with the goal of increasing uniformity in decision-making statewide.	1. DWS agrees with this recommendation. These events will address a number of the recommendations included in the study, e.g., numbers 8 and 9.	1. DWS will convene a series of events in Fall 2006 that will allow Financial and Employment Planners to discuss a variety of case management strategies, including this topic. Best practice ideas from all of the sessions will be compiled and be made available to all W-2 staff via the web. (Fall 2006)

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<b>Monitoring</b>		
11. Monitor adverse actions by race and require agencies with a high level of disparities to provide explanations.	1. DWS agrees with the recommendation. In 2004 DWS conducted a targeted review of sanctioned cases. A monitoring tool has been developed and regional office staff discuss results with agencies as appropriate.	1. DWS will continue to conduct targeted reviews of sanction cases with W-2 agencies and review the outcomes. (Ongoing)
12. Continue to monitor "significant sanction" cases through the DWS BW-2 Regional Offices to assure appropriate outcomes for all participants.	1. DWS agrees with this recommendation. In 2004 DWS conducted a targeted review of sanctioned cases. A monthly report of "significant sanctions" is provided to the regional offices.	1. DWS staff will continue to review the results of the "significant sanctions" cases with W-2 agencies to identify inappropriate sanctions. (Ongoing) 2. DWS will consider the imposition of fines on W-2 agencies that demonstrate an ongoing pattern of inappropriate sanctions. (Ongoing)
13. Increase BW-2 regional staff to ensure adequate case management monitoring can be continued.	1. DWS does not have budget authority to increase the number of regional monitoring staff at this time.	1. While DWS cannot increase the number of Regional Administrators who monitor W-2 agencies, it has established a Monitoring Priorities workgroup to identify standardized reports to assist in the timely monitoring of key program areas. These electronic reports will be used to effectively monitor the W-2 agencies in the 2006-2009 contract period. (June 2006)
<b>Analysis</b>		
14. Analyze why people of color are much more likely to be placed in CSJs than white participants.	1. Study design in planning state.	1. Phase 1 of report to be submitted to AO, December 2006
15. Conduct a comprehensive study of sanctions, strikes and other adverse actions by race in the 2006-2008 biennium.	1. DWS has developed monitoring tools for review of cases that have been sanctioned (see comment on monitoring recommendations). 2. Production report was prepared to comply with	1. DWS is planning a monitoring report: individual listings, sanction amounts, geography, FEP, placement, race. With summary pages. Development of the report is underway (June,

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	the 2005-2007 budget provision requiring notice to participants whose benefit was penalized 20 percent or more. (January 2006)	2006)
16. Analyze the significant changes in racial disparities between 2001, 2002, and 2003 and seek to identify patterns or factors that may have contributed to the reduction or increase. This could be used to develop best practices that could be implemented in Wisconsin, as well as other states.	1. See comment on first recommendation.	1. Report on sanctions by work program activity. For each activity, the study examines racial disparities in sanctions by analyzing hours in the activity. (to be submitted to AO, May 2006). 2. Analysis of changes based on interviews and statistical data. (late 2007)
17. Examine the findings related to Native American participants, whose sanction rates are also much higher than white participants.	1. Targeted Sanction study included a review of March 2004 data in Madison Region. This issue will be implemented via the monitoring process.	
18. Recommend that the proposal to evaluate the W-2 screening and assessment process be approved.	1. The "Evaluation of W-2 Screening and Assessment Process" was completed in January 2006. See comment on recommendation #5.	
19. Create and release a standardized, annual report of sanctions by race.	1. DWS completed "The Impact of Race on W-2 Sanctions from 2000 to 2004." This report updated the regression analysis that was part of the Sanctions Study. The report was posted to the DWS Web site on January 27, 2006. The results of this updated report will drive DWS' future actions in this area.	1. DWS will conduct a discussion of this report during the April 21, 2006 W-2 C&I meeting to inform agency best practices. 2. Update for 2005, reference tables only (January 2007)